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# Clinger Cohen Act (CCA): Integrating CCA (U.S.C. Title 40) Into Mainstream Processes – Improving Decision-Making

Department of Defense (DoD)
Deputy Chief Information Officer (DCIO) &
Acquisition, Technology and Logistics (AT&L)

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# CCA Knowledge Fair Working Session

- This working session focuses on:
  - Clearly articulating the CCA opportunities and challenges of greatest interest to Knowledge Fair participants.
  - Identifying success stories that demonstrate DoD's achievement of Congress' original vision reflected in CCA.

- This briefing provides CCA contextual background and candidate issue areas.
  - Review the briefing, and then select a specific topic area to articulate in more depth. Topic may be one included here, or a new one your group creates.
  - We also want you to record CCA successes.
  - Use the worksheets provided at the end of this briefing to record your work.

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# Background: CCA Policy Context

- Congress enacted CCA to ensure that information technology (IT) investments adhere to sound business and technology practices.
- In response, DoD established the CIO, and incorporated new policies into existing management processes to strengthen IT investment-related analysis and decisions.
- DoD has implemented CCA investment management provisions primarily through: DoD 5000 Series; Defense Acquisition Guidebook; and Joint Capabilities Integration and Development System (JCIDS) process (CJCSI 3170.01).
- The next two slides present the specific references that drive many CCA compliance activities today….

# Background: DoDI 5000.2 Requirements

- CCA compliance requirements are most explicitly described in DoDI 5000.2 Section 3.6.4 and Enclosures 3 and 4.
  - Enclosure 3 - Table E3.T1 lists statutory information requirements and includes the Post-Deployment Performance Review, citing both GPRA, 5 U.S.C 306, and CCA, 40 U.S.C. 11313.
  - Enclosure 4 states: “MDA shall not approve program initiation or entry into any phase that requires milestone approval for an acquisition program for a mission-critical or mission-essential IT system until the DoD Component CIO confirms or certifies (for MAIS only) or confirms (for MDAPs) that system is being developed in accordance with CCA.”
  - The DoD Component CIO’s confirmation or certification shall include a written description of the three materiel questions of DoDI 5000.2 Section 3.6.4 and the considerations in Table E4.T1. ….



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# Background: Table E4.T1. – 11 CCA Elements

| Table E4.T1 – CCA Elements |
|---|
| 1. Supports core priority functions (Echoes first question in Section 3.6.4) |
| 2. Existing source can't support function. (Echoes second question in Section 3.6.4) |
| 3. Process Redesign: reduces cost, increases effectiveness, and maximizes COTS. (Echoes third question in Section 3.6.4). |
| 4. Analysis of Alternatives (AOA) |
| 5. Economic Analysis (EA) complete. |
| 6. Performance measures linked to strategy. |
| 7. Program progress measures & accountability. |
| 8. Consistent with the Global Information Grid (GIG) |
| 9. Information Assurance (IA) strategy. |
| 10. Modular, incremental contracting. |
| 11. System has been registered in DoD IT Portfolio Repository (DITPR) |

- Table E4.T1 lists eleven key elements that contribute to CCA compliance, three of which echo the three materiel questions in Section 3.6.4.
- Table is completed by PM at acquisition milestones: "PMs shall prepare a table such as the one illustrated at Table E4.T1 to indicate which acquisition documents correspond to the CCA requirements."
- "DoD Component CIOs shall use acquisition documents identified in the table to assess CCA compliance."



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# Background: CCA Assessment & Improvement

- The CCA Assessment & Improvement Project
  - The DCIO and AT&L have collaborated on the CCA Assessment and Improvement Project since Fall 2004.
  - Driving Objective: Lay the groundwork for strengthening the integration and effectiveness of information technology within the broader Acquisition process, from concept to sustainment.
- Key Project Phases
  - CCA Assessment led by the DoD DCIO and AT&L in 2004-2005, with a Letter to Congress issued in July 2005.
  - We are now in the CCA Improvement phase, focusing on CCA capability development, streamlining certification requirements, and revising DCIO's approach to oversight.

# CCA Assessment: Key Findings

**Issue #1: CCA Goals and Context**

- A wide range of DoD IT investment and management guidance generates confusion about CCA goals and uneven accomplishment of objectives.
- At the policy level, CCA is seen as vital to Net-Centricity; the program level perceives CCA as burdensome compliance need.

**Issue #2: Role Definition**

- Multiple organizations impact IT investment management, but roles and responsibilities are unclear and redundant.
- DoD CIO and Component CIO's have diverse and inconsistent policy and oversight responsibilities and requirements.
- PM's often bear burden for CCA compliance across the life cycle.

**Issue #3: Timing and Process**

- Timing drives the perceived effectiveness of CCA – milestone reviews seen as "after-the-fact" compliance rather than useful framework.
- CCA requirements have been layered upon, rather than interwoven with, existing requirements.

**Issue #4: Knowledge Management**

- Ineffective communication and training aggravate negative CCA perceptions.
- Compliance expectations are inconsistent, from OSD down, and between Components.

# CCA Improvement: Moving Forward

- July 2005 DoD Report to Congress: Actions Underway
  - Clarify existing instructions to reduce the unneeded paperwork burden and redundancies in the acquisition and CIO reviews that has emerged over time.
  - Increase training for acquisition and IT professionals on best practices for ensuring effective management of IT investments at all steps of the process.
  - Compare individual DoD Component roles, practices and requirements with respect to CCA confirmation to determine which practices are most effective and add the greatest value to the Department.
  - Continue development and growth of the CCA Community of Practice.

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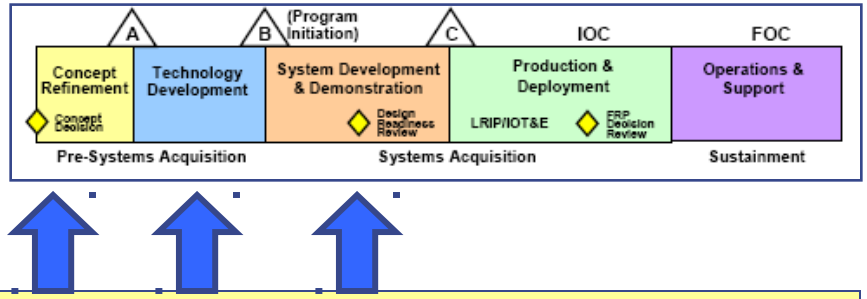
# CCA Improvement: Focus Areas

The CCA "To Be" model shifts DCIO from systems-level milestone reviews to front-end involvement in key capability areas, with oversight focused at the Portfolio/Domain level.

**Focus on Subject Matter Area Capability Gaps**
Process Redesign
Performance Measures

**Maximize Up-Front Involvement**



**CCA Confirmation: Implement New Oversight Model**
- Define Core CCA Capabilities for Business & Weapons Systems
- Assess Component Capability Across CCA areas
- Identify Existing Oversight Roles & Duplication
- Create Risk Classification Method to Drive Oversight Choices
- Reorient Oversight Based on Capability & Risk

**CCA Certification: Clarify Requirements**
- Clarify Baseline Certification Expectations
- Renegotiate Congressional Certification

**Remove Redundancies & Streamline Reviews**

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# Opportunities & Challenges Remain…..

- The following slides summarize opportunities and challenges that have emerged during the CCA Assessment & Improvement Project.
- Your group may explore one of these topics, or develop a topic statement of your own based on interest….
- Record your work on the worksheets provided on Slides 13 and 14.

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## TOPIC AREA: DEFINING INFORMATION TECHNOLOGY (IT)

- **IT programs come in many forms and sizes:** NSS/Embedded Systems, IT Omnibus Support/Service contracts, lower ACAT programs. Current CCA policies don't clearly differentiate requirements between different IT types, beyond the MDAP-MAIS distinction.

- **Study Quote:** "Is it an Airplane or Flying IT? Where is CCA critical? Do we focus on the code itself, at the platform level, or only systems that integrate with others? As embedded IT becomes the norm, clarity about how CCA goals apply is more and more critical."

- **Issues:** How might CCA compliance requirements be altered to reflect different IT types? How would we differentiate IT categories and associated compliance requirements and outcome measures? What could an incremental or graded approach to CCA look like?

## TOPIC AREA: ALIGNING CCA ROLES & RESPONSIILITIES

- **The PM is held responsible for reporting on pre-program decisions:** While many CCA areas of interest focus on the investment decision itself, PMs are often left to justify these decisions much later in the Acquisition process.

- **Study Quote:** "Asking a PM to do CCA compliance at the milestone makes it a default paperwork exercise, because it is not the PMs job to do some things CCA requires. Lots happens long before the PM is assigned, and if an 'alternative source' was selected, there would never be a PM."

- **Issues:** How could CCA be better integrated into existing mainstream up-front investment processes? How could CCA compliance be demonstrated through the existing work of the Sponsor/PSAs, saving the PM documentation work downstream?

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## TOPIC AREA: MOVING TO CAPABILITY LEVEL CCA

- **CCA remains a program/system level activity:** Despite the current DoD focus on IT investment management Portfolios and Capabilities, CCA remains a program level activity.
- **Study Quote:** "The program and system-level focus of CCA detracts from the principles of both netcentricity and interoperability – to meet the real intent of CCA, it should be done at a portfolio or capability level."
- **Issues:** How could we reorient CCA compliance from a program/system view to a capability or portfolio level? What could compliance look like at this higher level, while still meeting both the intent and legal requirements of CCA legislation?

## TOPIC AREA: MOVING FROM PROCESS TO OUTCOMES

- **At the program level, CCA continues to be perceived as a process-based compliance issue:** Given that CCA compliance is documented at the milestone, its implementation has diverged from its intent. The emphasis is more often on process than outcomes and decision-making.
- **Study Quote:** "We need to get back to the central questions: How do we get IT investment questions on the table early in the decision process? How do we know what to worry about, and how can the CIO best support that process?"
- **Issues:** What role should and does the CIO play up front in the investment decision process? Beyond the authority embedded in policy, how and when is the CIO brought to the table and involved in a way that ultimately leads to better investment outcomes?

# Worksheet #1 – CCA Topic Area

**What CCA related topic do you want to address? State as Problem or Goal Statement:**

**What makes problem or goal particularly important? List benefits of a solution.**

**What's hard about this problem or goal? What are the barriers to addressing it?**

**Who is most impacted by this problem, or would be most benefited by a change?**

**Who would need to change to solve the problem or achieve the goal?**

# Worksheet #2 – CCA Successes

**Provide an example of how applying the IT investment discipline required by CCA has led to better outcomes. What was done, and what was the improvement in outcome?**

**List at least 3 positive things that CCA has done over the past 10 years for the….**

**WARFIGHTER** **TAXPAYER**

**How should we assess and demonstrate the success of CCA itself? What outcomes or performance measures would best demonstrate that the IT investment management function has been successful in DoD?**

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